

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In Re:)	Case No.: 20-00325-swd
)	
Interlogic Outsourcing, Inc.)	AP Case No.: 20-80016-swd
)	
)	Chapter 11
Universal Credit Services, Inc.)	
)	Honorable Scott W. Dales
Plaintiff,)	
)	
Interlogic Outsourcing, Inc., Najeeb Khan,)	
Key Bank National Association, and)	
DOES 1-10,)	
)	
Defendants.)	

**RESPONSE TO NOTICE OF INTENTION TO DISMISS
AND CLOSE ADVERSARY PROCEEDING FOR LACK OF PROGRESS AND
REQUEST FOR STATUS CONFERENCE**

Plaintiff, Universal Credit Services, Inc. (“Universal”), through its undersigned counsel, for its response to this Honorable Court’s Notice of Intention to Dismiss and Close Adversary Proceeding For Lack of Progress (ECF Doc #8), respectfully requests that this adversary proceeding remain open, and that the Court schedule a status conference to discuss scheduling matters.

On August 29, 2019, Universal filed this lawsuit in Livingston County Circuit Court asserting various state law claims against the Defendants Interlogic Outsourcing, Inc. (“IOI”), Najeeb Khan (“Khan”), and Key Bank National Association (“Key Bank”).

Thereafter, on October 1, 2019, KeyBank filed a notice of removal of this action to the United States Bankruptcy Court for the Eastern District of Michigan and motion to change venue of this action to the United States Bankruptcy Court for the Northern District of Indiana. Universal vigorously opposed Key Bank’s motion to transfer this action to Indiana. However, on November

12, 2019, Key Bank's motion to change venue was granted. On January 21, 2020, this action was transferred again to this Honorable Court.

To summarize, Universal's "delay" in prosecuting this case stems from no fault of its own. This case has been transferred to three different courts subsequent to Universal's original filing in the State of Michigan Court. Universal has also learned in recent days that Key Bank has retained counsel from an entirely different law firm to appear in this case going forward. However, no appearances have been filed for any Defendant.

For these reasons, Universal respectfully requests that this Honorable Court keep this case open and schedule a status conference to discuss scheduling matters.

Respectfully Submitted,

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